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October 7, 2024

**Via ECF**

Hon. James B. Clark, III  
United States Magistrate Judge  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: **In the Matter of the Complaint of Grimaldi Deep Sea S.p.A. as  
Owner/Operator of M/V Grande Costa D’Aorio for Exoneration  
From or Limitation of Liability  
Civil Action No. 2:23-cv-20340-JXN-JBC**

Dear Judge Clark:

I am writing on behalf of Plaintiff Grimaldi Deep Sea S.p.A. (“Grimaldi”) to request that the Court sign and enter the attached proposed Confidentiality Order, which has been agreed upon by all counsel. The proposed order mirrors the title and wording of Appendix S (updated May 2, 2024) to the Court’s Local Rules.

Respectfully submitted,

*s/John J. Levy*

John J. Levy

JJL:med

cc: All Counsel of Record (*via ECF notification*)

**MONTGOMERY McCRACKEN WALKER & RHOADS LLP**

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A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP  
MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER